

REMARKS/ARGUMENTS

Various claims are being amended as shown above. The claim amendments clarify the claim language and are not intended to limit the scope of the claims, unless the claim language is expressly quoted in the following remarks to distinguish over the cited art.

In section 2 of the office action, claims 1-6, 21-26, 28 and 37-76 were rejected under 35 U.S.C. 102(b) as allegedly being anticipated by Tustaniwskyj, et al. (U.S. Patent No. 6,042,388). Applicants respectfully traverse the rejection.

Tustaniwskyj is directed to an electromechanical module 10 with pressed electrical connections including a printed circuit board 13, a thin-springy plate 16 which has a flat central section 16a, an adjacent periphery section 16b that extends away from the printed board 13, and two elongated ridges 16c in the flat central section 16a. The two elongated ridges 16c are in contact with the printed circuit board 13. Since Tustaniwskyj discloses the thin-springy plate 16 with a flat central section 16a, Tustaniwskyj does not disclose nor suggest a plate 16 that is pre-curved. Tustaniwskyj instead discloses a pre-angled plate 16 and does not disclose a pre-curved plate 16.

Independent claim 1 distinguishes over Tustaniwskyj at least by reciting, "attaching said pre-curved bolster plate on said second side of said substrate, wherein said pre-curved bolster plate is attached to said second side opposite said electrical contact area on said first side of said substrate," (emphasis added), and such recited features are not disclosed or suggested by Tustaniwskyj.

Furthermore, the drawings do not show and the specification text (including the cited columns 3-4) do not mention in Tustaniwskyj of a pre-calculated radius of curvature that is pre-calculated in the thin-springy plate 16. Furthermore, Tustaniwskyj does not mention in the cited columns 3-4 of the angles (formed by portions 16a and 16b in Figure 1) as being pre-calculated in the thin-springy plate 16. Instead, Tustaniwskyj discloses a thin-springy plate 16 with a flat central section 16a and springy arms 16b which avoid the need to pre-calculate the angles formed by portions 16a and 16b, let alone avoid the need to pre-calculate a radius of curvature.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The pre-calculated radius of curvature (or pre-curved bolster plate), as recited in the claims, controls the bending stress on the substrate 104 by providing a pre-curved plate portion that beneficially lessens the bending stress on the substrate 104. In contrast, Tustaniwskyj does not disclose a pre-calculated radius of curvature (or pre-curved bolster plate) to control the bending stress on a substrate. Instead, Tustaniwskyj discloses the use of the ridges 16c (Figure 1) which are positioned by distance "a" in order to control the bending stress on the circuit board 13.

Therefore, there is no explicit or implicit disclosure in Tustaniwskyj about a pre-curved plate portion or a pre-calculated radius of curvature as recited in the claims.

Accordingly, the pending claims are each patentable over Tustaniwskyj.

For the above reasons, Applicants request reconsideration and withdrawal of this rejection under 35 U.S.C. §102.

In section 3 of the office action, claims 7 and 27 were rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Tustaniwskyj, et al. (U.S. Patent No. 6,042,388). Applicants respectfully traverse the rejection.

The Examiner correctly admits in the office action that Tustaniwskyj does not explicitly disclose the pre-curved bolster plate that has a radius curvature in excess of 100 inches (254 centimeter). In an attempt to overcome the deficiency of Tustaniwskyj, the Examiner asserts that the chosen dimensions are not critical to the invention.

Claims 7 and 27 depend from claim 1 and claim 21, respectively, and are each patentable over Tustaniwskyj, for at least the same reasons that claim 1 and claim 21 are each patentable over Tustaniwskyj.

Furthermore, each of the claims 27 and 27 distinguishes over Tustaniwskyj by reciting additional features.

Accordingly claims 7 and 27 are each patentable over Tustaniwskyj.

For the above reasons, Applicant requests reconsideration and withdrawal of this rejection under 35 U.S.C. §103.

For the above reasons, Applicants respectfully request allowance of all pending claims.


If the undersigned attorney has overlooked a teaching in any of the cited references that is relevant to the allowability of the claims, the Examiner is respectfully requested to specifically point out where such teachings may be found.

CONTACT INFORMATION


If the Examiner has any questions or needs any additional information, the Examiner is invited to telephone the undersigned attorney at (805) 681-5078.

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Respectfully submitted,
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